## **OGC Has Reviewed**

22 March 1977

MEMORANDUM FOR THE RECORD

STATINTL FROM

Deputy Chief, Benefits and Services Division

SUBJECT:

OGC Opinion re GEHA Regulation by D. C. and

Virginia Insurance Commission, dated

28 Feb 77

On 17 March 1977 I called in OGC regarding his memo of 28 February 1977. I indicated that we had some concern with paragraph 9(e) of his memo in that we, GEHA, are responsible for the free retiree coverage under UBLIC. I STATINTL briefly outlined how this came about. Indicated that he was not aware of this but it did not change his position. He said there were approximately 10 factors to consider in reaching that position. He was 90% sure of his position before I called and now perhaps 85% sure. He referred to the Metropolitan Police Retiring Association case and the Mosanto Co. case mentioned in his memo. He is still of the opinion that GEHA is not subject to the regulatory authority of either D. C. or Virginia.



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